

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

MOREHOUSE ENTERPRISES, LLC	)	
d/b/a BRIDGE CITY ORDNANCE, GUN	)	
OWNERS OF AMERICA, INC.,	)	
and GUN OWNERS FOUNDATION,	)	
	)	Case No. 3:23-cv-00129-PDW-ARS
Plaintiffs,	)	
	)	
v.	)	
	)	
BUREAU OF ALCOHOL, TOBACCO,	)	
FIREARMS AND EXPLOSIVES; UNITED	)	
STATES DEPARTMENT OF JUSTICE;	)	
STEVEN M. DETTELBACH in his official	)	
capacity as THE DIRECTOR OF ATF, and HANS	)	
HUMMEL, in his official capacity as	)	
THE DIRECTOR OF INDUSTRY OPERATIONS	)	
FOR THE SAINT PAUL FIELD DIVISION OF	)	
THE ATF,	)	
	)	
Defendants.	)	
	)	

---

**PLAINTIFFS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY**

---

Come now, Plaintiffs, by and through counsel, pursuant to Civil Rule 7.1(C), and for good cause, file this Motion for Leave to File Supplemental Authority, and in support state as follows:

1. Plaintiffs filed their Motion for Preliminary and/or Permanent Injunction on August 4, 2023. ECF 15-1.
2. On September 8, 2023, Defendants filed their Opposition to Plaintiffs' Motion for Preliminary Injunction. ECF 34.
3. On September 22, 2023, Plaintiffs filed their Reply. ECF 40.
4. On October 2, 2023, the United States District Court for the Northern District of Texas, Fort Worth Division, issued an opinion that contains language pertinent to the issues presented in

Plaintiffs' Motion for Preliminary and/or Permanent Injunction. *See William T. Mock, et al., v. Merrick Garland, Et al.*, Civil Action No. 4:23-cv-00095-O.

5. Plaintiffs therefore seek leave to file the attached Notice of Supplemental Authority, explaining how *Mock* is applicable to the issues raised in the instant case.

Respectfully submitted, this the 4th of October, 2023.

/s/ Stephen D. Stamboulieh

Stephen D. Stamboulieh (MS # 102784)  
Stamboulieh Law, PLLC  
P.O. Box 428  
Olive Branch, MS 38654  
(601) 852-3440  
[stephen@sdslaw.us](mailto:stephen@sdslaw.us)

Robert J. Olson (VA # 82488)  
William J. Olson, PC  
370 Maple Ave. West, Suite 4  
Vienna, VA 22180-5615  
703-356-5070 (T)  
703-356-5085 (F)  
[wjo@mindspring.com](mailto:wjo@mindspring.com)

John I. Harris III (TN # 12099)  
Schulman, LeRoy & Bennett PC  
3310 West End Avenue, Suite 460  
Nashville, Tennessee 37203  
(615) 244 6670 Ext. 111  
Fax (615) 254-5407  
[jharris@slblawfirm.com](mailto:jharris@slblawfirm.com)

### **CERTIFICATE OF SERVICE**

I Stephen D. Stamboulieh, hereby certify that I have on this day, caused the foregoing document or pleading to be filed with the Court's CM/ECF system, which generated a notice of electronic filing and delivered a true and correct copy of the foregoing to all counsel of record.

Dated: October 4, 2023.

/s/ Stephen D. Stamboulieh  
Stephen D. Stamboulieh